

CLIFTON BUDD & DEMARIA, LLP

ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING
350 FIFTH AVENUE, 61ST FLOOR
NEW YORK, NY 10118

TEL (212) 687-7410
FAX (212) 687-3285
www.cbdlm.com

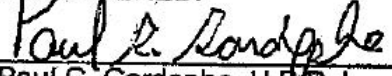
IAN-PAUL A. POULOS
ASSOCIATE
E-MAIL: IAPOULOS@CBDM.COM

November 11, 2021

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: November 15, 2021

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: Request to Extend Briefing Schedule
Watkins v. Anthony T. Rinaldi, LLC et al.
1:19-cv-08457-PGG-JLC

Dear Judge Gardephe:

This firm represents the Defendants in the above-referenced action. Pursuant to Paragraph I(D) of Your Honor's Individual Rules of Practice, the Defendants write with Plaintiff's consent to respectfully request an extension of the briefing schedule regarding summary judgment. *See* ECF Doc. 62. The reason for the extension is because the Defendants require time to prepare their motion papers. Based on the undersigned's current litigation deadlines, a number of which fall at the end of this month and the beginning of December, and the upcoming Thanksgiving holiday, the parties respectfully request the Court extends the briefing schedule as indicated below.

The current schedule is as follows: (1) November 29, 2021 (Defendants' moving papers); (2) December 29, 2021 (Plaintiff's opposition); and (3) January 10, 2022 (Defendants' reply). *See* ECF Doc. 62.

The proposed briefing schedule is as follows:

- Defendants' motion is due on December 30, 2021;
- Plaintiff's opposition is due on January 31, 2022.
- Defendants' reply, if any, is due on February 17, 2022.

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This is the first request to extend Your Honor's briefing schedule. This case involved six depositions, numerous subpoenas, over two thousand pages of paper discovery, and substantial litigation. The requested time is necessary for the parties to prepare their motion papers. Granting this request will not affect scheduled dates other than those indicated above.

Thank you for Your Honor's consideration.

Respectfully submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Defendants

By: 

Ian-Paul A. Poulos

CC: Counsel of Record (via ECF)